

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

ANDREW BALLENGER,

Plaintiff,

Case No. 1:23-cv-647

v

Hon. Jane M. Beckering

CALVIN UNIVERSITY and
KEVIN VAN DUYN,

Defendants.

NACHT & ROUMEL, P.C.
Nicholas Roumel (P37056)
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STIPULATED PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c), the parties stipulate to the following protective order, and IT IS ORDERED that the following information is deemed confidential:

- a) Scholastic records of current or former students, including documents protected by FERPA;
- b) Medical and mental health records relating to the Plaintiff or any other party (e.g. emails in which a party discloses medical or mental health information);
- c) Financial, tax and other similar confidential and personal information relating to Plaintiff and/or Defendant Calvin University's current and former employees, students, and athletes;
- d) Propriety information of Defendant.

This confidential information shall only be used to prosecute or defend this action and shall not be disclosed to (or the content discussed with) anyone other than the following persons:

- a. The named parties in this case, their attorneys, and their support staff (e.g., copying and document management personnel).
- b. Independent experts or consultants engaged by a party's attorneys to assist in the preparation and trial of this case who agree to abide by the terms of this Protective Order.
- c. Deposition witnesses whose testimony is being taken with respect to the document or thing, or about the subject matter of the document or thing, who agree to abide by the terms of this Protective Order.
- d. This Court and its staff members.

Any such information, that a party believes in good faith to be confidential pursuant to this order, may be redacted in electronic filings or otherwise filed pursuant to LR 5.3. A judge's courtesy copy need not contain the redaction.

Dated: January 17, 2024

/s/ Jane M. Beckering
U.S. DISTRICT COURT JUDGE

We stipulate to entry of this order:

s/ Nicholas Roumel (w/consent)
Nicholas Roumel (P37056)
Attorney for Plaintiff

Dated: January 16, 2024

s/ Zeth D. Hearld
Joseph A. Starr (P41651)
Zeth D. Hearld (P79725)
Attorneys for Defendants